

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

Case No. 03-md-1570 (GBD)(SN)

ESTATE OF ALICE HOGLAN, BY ITS PERSONAL
REPRESENTATIVE CANDYCE S. HOGLAN, ET. AL.,

Case No. 11-cv-7550 (GBD)(SN)

Plaintiffs-Judgment Creditors,

v.

OAKTREE CAPITAL MANAGEMENT, LP; FLEETSCAPE
CAPITAL HOLDINGS LIMITED; AND FLEETSCAPE SUEZ
RAJAN LLC;

**DECLARATION OF DOUGLASS
A. MITCHELL IN OPPOSITION
TO RESPONDENTS' MOTION
TO QUASH THE HOGLAN
CREDITORS' DEPOSITION
SUBPOENA**

Garnishees.

I, Douglass A. Mitchell, hereby declare:

1. I am an attorney duly licensed to practice law in the state of Nevada and admitted to the bar of this Court *pro hac vice*. I am a partner with Jenner & Block LLP, counsel to Judgment Creditors Estate of Alice Hoglan et al. (the "Hoglan Creditors") in the above-captioned action. I make this declaration in opposition to the motion of Oaktree Capital Management, LP, Fleetscape Capital Holdings Limited, and Fleetscape Suez Rajan LLC (collectively, "Respondents") to quash the Hoglan Creditors' subpoena for a deposition of Martin Graham. Except for those matters on information and belief, which I believe to be true, I have firsthand knowledge of the contents of this declaration and I could testify thereto.

2. Attached hereto as **Exhibit A** are true and correct copies of information subpoenas issued by the Hoglan Creditors to Respondents on June 23, 2022.

3. Attached hereto as **Exhibit B** are true and correct copies of document subpoenas issued by the Hoglan Creditors to Respondents on June 23, 2022.

4. Attached hereto as **Exhibit C** are true and correct copies of Respondents' responses and objections to the above-referenced information and document subpoenas, dated July 5, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of a screenshot captured on July 7, 2022 from lloydslist.com, showing a New York office address and phone number for Fleetscape Capital Holdings Limited. The phone number in the screen shot is the same number I called on February 24, 2022. As stated in my March 2, 2022 Declaration, my phone call was answered by an individual who confirmed that I had reached Fleetscape. *See* Dkt. 7723 ¶ 18.

6. Attached hereto as **Exhibit E** is a true and correct copy of a screenshot captured on July 7, 2022 from linkedin.com, showing the profile for Fleetscape Capital and referencing a New York office.

I declare that the foregoing is true under penalty of perjury of the laws of the United States.

Executed this 8th day of July at Arlington, Virginia.

By: /s/ Douglass A. Mitchell
Douglass A. Mitchell